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To: The Joint Legislative Committee Meeting on Proposed Rule Changes for Home-Based and Center Rules

Commentary regarding the proposed family and group home child care rules:

My name is Candra Womble. I have been working with young children in some capacity since 1963. I became a licensed family home childcare provider in 1980, and in 1991, I was licensed for group childcare. I would prefer to address this committee in person, but I am unable to leave the childcare today.

I am a childcare professional. To remain current with the profession and early childhood developmental research, I maintain memberships in several early childhood and childcare professional organizations and attend continuing education events annually. As an advocate for young children, I have worked with others in establishing home-based childcare provider support groups statewide. During the past eighteen months, with the full support of my clients, I have served as one of five childcare provider members of the Advisory Committee that developed the proposed changes in family and group home child care rules.

I strongly support the revision of the current rules applying to home-based family and group childcare. This revision is long overdue.

Some aspects of the current rules have caused me concern for many years.

1. I feel there is an unspoken message between state regulations for family child care and center child care that says – " children whose parents choose home-based child care settings have fewer rights to healthy, safe, and quality environments than children whose parents choose center childcare." While home care definitely is different from a center program, there are several basic health and safety requirements that must be the same.
2. I often find the lack of clarity in the wording of the current rules quite problematic. The current language leaves many of the rules so open to interpretation that consultants and providers frequently have differing opinions as to compliance. At times, the next consultant visiting my home has directly contradicted what has been required of me for compliance by a previous consultant. A review of my records indicates that conflicting interpretations between consultants cost me over \$500 in unnecessary expenses in one two year period. Clarity in the language of Michigan's childcare regulations is essential.

I would like to highlight a few of the proposed changes that I believe will improve home-based childcare settings.

1. Parents need the assurance that providers have appropriately safe persons with their children. A new rule (**R400 1904**) addresses assistant caregivers. Currently there are no rules applying to persons who provide care to the children other than the registrant/licensee.
2. I know of no profession where continuing education is not required. **R400 1905** addresses caregiver training. I believe there is a direct relationship between provider education and the quality of the care and environment they provide. Provider training is available throughout the state and offered free or at minimal costs. I attended over fifty hours of continuing education last year and my total expense was \$20.00.

3. I heard comments during the public hearings that the proposed rules are trying to make home settings too center-like. I am a home provider and I do not see that in these rules.
 - a. One rule often cited regards monthly fire drills. I believe this is essential to the safety of young children. Developmentally, most infants and toddlers are terrified of loud noises. Their response, once they can walk, is to run and hide from these noises. As the daughter of a fire fighter, I have too often heard stories of toddlers found hiding under the bed or in a closet, dead of smoke inhalation. Monthly drills help infants and toddlers recognize the sound of smoke alarms and what the sound is for – a warning. I have always conducted regular drills for fire and tornadoes and encourage each of my enrolled families to do the same. The drills teach young children about the importance of leaving dangerous situations.
 - b. Another section of rules I heard referred to negatively, are those rules that address record keeping. Record keeping is simply good business practice. Good records assist providers in communicating with their clients, and protect the caregiver in the event of questions from food programs or licensing. Additionally, accurate records assist with annual tax preparation. I have found over the years that many home providers view their relationship with children's parents casually. They do not think of themselves as a business owner. It is my understanding that once people accept money to care for unrelated children in their home, they are a small business. The proposed record keeping rules may assist providers in taking a step toward being a more responsible small business owner in Michigan.

Many children spend more time daily with a childcare provider than they do with their own parents. I believe it is the childcare provider's job to offer these children safe, healthy environments that give each child a developmentally appropriate daily experience.

Michigan ranks near the top in the nation for educating children grades K-12, but ranks forty-ninth in regulations for those caring for, and providing the foundation for, our children birth to five years of age. When children leave childcare for a school environment, they need to leave with confidence and ready to succeed.

I believe the proposed changes and new rules still offer only a minimal standard for children's home childcare settings. They do not go nearly as far as I, personally, would go with them. They are still not on a par with accreditation site guidelines, but they are a step in the right direction. Our children deserve, at the very least, this small step forward.

As a home-based childcare provider, I support the proposed rules for family and group home childcare.

Thank you for giving me the opportunity to speak on this issue.

Candra Womble